

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D. N.J. LBR 9004-1(b)

RIKER DANZIG SCHERER HYLAND &  
PERRETTI LLP

Joseph L. Schwartz, Esq. (JS-5525)

Tara J. Schellhorn, Esq. (TS-8155)

Tod S. Chasin, Esq. (TC-0122)

Headquarters Plaza, One Speedwell Avenue

Morristown, New Jersey 07962-1981

Telephone: (973) 538-0800

Facsimile: (973) 538-1984

jschwartz@riker.com

tschellhorn@riker.com

tchasin@riker.com

*Counsel to Newark Warehouse Urban Renewal,  
LLC and Newark Warehouse Redevelopment  
Company, LLC*

In re:

HOLLISTER CONSTRUCTION SERVICES, LLC,

Debtor.

Adv. No.: 19-2222

Case No.: 19-27439

Chapter: 11

Hearing Date: March 5, 2020

AMENDED  
**ADJOURNMENT REQUEST**

1. I, Joseph L. Schwartz, Esq.,

☒ am the attorney for: Newark Warehouse Urban Renewal, LLC and Newark Warehouse Redevelopment Company, LLC (together, the “NWR Parties”)

☐ am self represented,

and request an adjournment of the following hearing for the reason set forth below.

**Adversary Proceeding Case No. 19-02222:**

Matter: Motion to Remand State Court Action to the Superior Court of New Jersey, Or, In the Alternative, Abstaining from Exercising Jurisdiction Over the State Court Action [Docket No. 5].

**Main Case No. 19-27439:**

Matter: Motion to Remand State Court Action to the Superior Court of New Jersey, Or, In the Alternative, Abstaining from Exercising Jurisdiction Over the State Court Action [Docket No. 473].

Current Hearing Date: March 5, 2020 at 10:00 a.m.

New Date Requested: The NWR Parties request at least a two-week adjournment of the above-referenced matter, depending on the Court's availability.

Reason for adjournment request: As the Court is aware, the parties have been engaged in ongoing discussions regarding a potential global settlement of these matters. In connection with these ongoing global settlement discussions, the NWR Entities previously agreed to the Debtor's requests on multiple occasions to adjourn the above-referenced matter. Several weeks ago, the NWR Entities made a settlement offer to the Debtor, but only received a response to that offer from the Debtor this past weekend. As a result, the NWR Entities requested an adjournment from the Debtor of the above-referenced matter for at least two weeks. In response, the Debtor advised that it would not consent to the NWR Entities' adjournment request. The NWR Parties now seek at least a two week adjournment from the Court.

2. Consent to adjournment:

☐ I have the consent of all parties. ☒ I do not have the consent of all parties (explain below): As is reflected above, the NWR Parties requested the Debtor's consent to an adjournment of the above-references matter; however the Debtor refused to consent to this adjournment request.

I certify under penalty of perjury that the foregoing is true.

Date: March 2, 2020

/s/ Joseph L. Schwartz

**COURT USE ONLY:**

---

The request for adjournment is:

☒ Granted New hearing date 3/18/2020 at 11:00 a.m. ☐ Peremptory

☐ Granted over objection(s) New hearing date: \_\_\_\_\_ ☐ Peremptory

☐ Denied

**IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.**

5116765v1